

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

21 MC 102 (AKH)

IN RE LOWER MANHATTAN DISASTER  
SITE LITIGATION

JAIME ROJAS (AND WIFE, JOHANNA  
HERNANDEZ)

Plaintiff,

-against-

BELFOR USA GROUP, INC., et al.  
Defendants.

DOCKET NUMBER: (AKH) 07CV4511

NOTICE OF ADOPTION OF  
ANSWER TO MASTER COMPLAINT OF  
BELFOR USA GROUP, INC.

Defendant, Belfor USA Group, Inc. ("Belfor"), hereby adopts as its Answer in the instant case its Answer and Defenses to Plaintiffs' Master Complaint in this litigation which were filed and served on August 3, 2007. In accordance with Case Management Order No. 4, the allegations of the instant Check-Off Complaint are deemed to be denied. By way of further answer, Belfor also incorporates by reference all averments and denials of its Answer and Defenses to the Master Complaint as though same were more fully set forth herein at length.

Dated: New York, New York  
September 14, 2007

COZEN O'CONNOR

By: 

James F. Desmond, Jr., Esquire (JD-8941)  
45 Broadway Atrium, Suite 1600  
New York, New York 10006  
(212) 509-9400  
Attorneys for Defendant  
Belfor USA Group, Inc.

OF COUNSEL:

Thomas R. Harrington  
Cozen O'Connor  
1900 Market Street  
Philadelphia, PA 19103  
(215) 665-2706

**CERTIFICATE OF SERVICE**

I, JAMES F. DESMOND, JR., hereby certify that a true and correct copy of Defendant Belfor USA Group, Inc.'s Notice of Adoption of Answer and Defenses to Master Complaint was served this 14 of September, 2007, via ECF upon the following:

Gregory J. Cannata, Esquire  
The Law Firm of Gregory J. Cannata  
233 Broadway – Floor 5  
New York, New York 10279

Robert Grochow, Esquire  
The Law Firm of Gregory J. Cannata  
233 Broadway – Floor 5  
New York, New York 10279

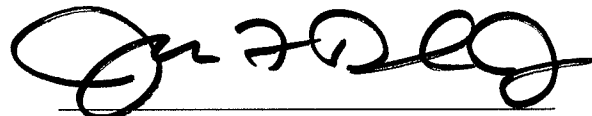
Christopher R. LoPalo, Esquire  
Worby Groner Edelman & Napoli Bern, LLP  
115 Broadway – 12<sup>th</sup> Floor  
New York, New York 10006

Richard Williamson, Esquire  
Fleming Zulack Williamson Zauder, LLP  
One Liberty Plaza  
New York, New York 10006

James Tyrell, Esquire  
Patton Boggs, L.L.P.  
One Riverfront Plaza, 6th Floor  
Newark, N.J. 07102

Andrew Carboy, Esquire  
Sullivan, Papain, Block,  
McGrath & Cannavo, P.C.  
120 Broadway  
New York, NY 10271

Peter Wies, Esquire  
The City of New York Law Department  
World Trade Center Unit  
100 Church Street  
New York, NY 10007

A handwritten signature in black ink, appearing to read 'James F. Desmond, Jr.', written over a horizontal line.

James F. Desmond, Jr.